

## REMARKS/ARGUMENTS

In this Amendment, Applicants have cancelled non-method claims 2-8 and 15-21, and 25-30 from further consideration in this application. Applicants are not conceding that the subject matter encompassed by claims prior to this Amendment is not patentable over the art cited by the Examiner. Claims were cancelled in this Amendment solely to facilitate expeditious prosecution of the pending claims. Applicant respectfully reserves the right to pursue claims, including the subject matter encompassed by claims, as presented prior to this Amendment and additional claims in one or more continuing applications.

The Examiner rejected claims 1, 9-14, and 22-24 as obvious (35 U.S.C. §103) over Stedman (U.S. Patent No. 6,081,837), Imai (U.S. Patent No. 6,148,334), and Buckley (U.S. Patent No. 6,035,327). Applicants traverse.

Claim 1 concerns providing information describing a file system connection between a local file system located on a local system and a host file system located on a host system, said method comprising: encoding a host system data structure comprising at least one tag representing the host file system; and encoding a mapping data structure comprising at least one tag representing a mapping between a file in the local file system and a file in the host file system and a transfer type that defines a data format for transferring data between the host system and the local system to support remote editing of files in the host file system from the local file system, wherein the tags are in a metalanguage format, and wherein each tag has an identifier and a set of one or more attributes and wherein the encoded local system data structure, host system data structure, and mapping data structure forms a file system connection descriptor; and using the file system connection descriptor to access the host file indicated in the mapping data structure.

The Examiner cited Stedman as disclosing various of the claim requirements including encoding a local system, host system, and mapping data structures, where the mapping data structure has at least one tag representing a mapping between a file in the local file system and a file in the host file system and a transfer type that defines a data format for transferring data between the host system and the local system to support remote editing of files in the host file system from the local file system, and that the encoded local system data structure, host system data structure, and mapping data structure forms a file system connection descriptor; and using

the file system connection descriptor to access the host file indicated in the mapping data structure.

However, the Examiner did not cite any specific section of Stedman as teaching the claim requirements for which it was cited. Applicants' submit that this use of Stedman in the rejection is improper and does not comply with the requirements for claim rejections specified in the Code of Federal Regulations. ("When a reference is complex or shows or describes inventions other than that claimed by the applicant, the particular part relied on must be designated as nearly as practicable. The pertinence of each reference, if not apparent, must be clearly explained and each rejected claim specified", 37 CFR §1.104(c)(2); MPEP Sec. 707). If the Examiner maintains this rejection, Applicants request that the Examiner identify specific sections of Stedman that teach the requirements for which it is cited.

The Examiner cited col. 15, lines 44-54 and col. 2, lines 55-63 of Imai. (OA9, pg. 3) Applicants submit that a review of the cited Imai reveals that it does not teach or suggest the claimed local system data structure, host system data structure, and mapping data structure as comprising tags in a metalanguage format forming a file system connection descriptor to support remote editing of files in the host file system from the local file system.

The cited col. 15 mentions that the URL of a requested file is in a form enclosed by a special tag. When the file requesting client requests the requested file and the file is received from the file server, the requested file is displayed at the viewer of the file requesting client. The viewer also detects the URL of the file enclosed by the special tag. The cited col. 2 mentions providing a file transfer method to limit a number of files when a file transfer is not fast enough or storage capacity is insufficient or when a file display is limited.

The cited cols. 2 and 15 of Imai nowhere teach or suggest tags in a metalanguage format for a local system data structure, a host system data structure, a mapping data structure, and a transfer type. Instead, the cited cols. 2 and 15 discuss how a URL may be in a special tag and how to provide a file transfer method under certain conditions, such as when a file transfer is not fast enough, or available storage capacity is insufficient. Nowhere does the cited discussion in Imai teach or suggest the claim requirements of a local file system data structure, a host file system data structure, and a mapping data structure between files in the local file system and files in the host file system, and a transfer type comprising tags in a metalanguage format that

forms a file system connection descriptor. Instead, the cited Imai mentions that a URL is in a special tag, and how a requested file is displayed at the viewer of the requesting client.

Further, even if one were to combine the cited Imai with the other references, the cited combination does not teach the claim requirements concerning a local file system data structure, a host file system data structure, and a mapping data structure comprising tags in a meta language format as claimed. The cited Imai provides special tags for a URL of a file, not a local file system, host file system, and mapping data structures as claimed.

The Examiner then found that:

Stedman-Imai did not disclosed [sic], to support remote editing of files in the host file system from the local file system, wherein the tags are in a metalanguage format, and wherein each tag has an identifier and a set of one or more attributes and wherein the encoded local system data structure, host system data structure, and mapping data structure forms a file system connection descriptor; and using the file system connection descriptor to access the host file indicated in the mapping data structure.

(OA9, pg. 4).

The Examiner then proceeded to cite col. 19, lines 1-16 and steps 252, 258, and 250 of Buckley with respect to the above limitations not found in the cited Stedman-Imai. (OA9, pg. 5)

The cited Buckley mentions an encoder to encode additional data that will be sent to a server. Step 250 emits into the encoded data stream properties. The number of properties is represented as a DWORD. At step 252, the property tag for the next property line is emitted, where a property tag code has an identifier for the property name and a property tag code that identifies a property data type.

Nowhere does the cited Buckley teach or suggest the remote editing of files in a host file system from a local file system or teach tags in a metalanguage format encoded in a local system, data structure, host system data structure and mapping data structure that forms a file system connection descriptor. The cited Buckley mentions encoding properties into a data stream, such as a property name and a property tag code. However, there is not teaching or suggestion in the cited Buckley that the encoded properties comprise tags in a metalanguage format and that an encoded local, host, and mapping data structures form a file system connection descriptor used to access the host file to support remote editing as claimed. Instead, the cited col. 19 discusses encoding a property tag into a data stream, not the specific details of encoding host, local and mapping data structures as claimed.

Thus, the cited Stedman, Imai and Buckley even when combined do not teach or suggest the claim requirements of a local system data structure, host system data structure, and mapping data structure as comprising tags in a metalanguage format forming a file system connection descriptor to support remote editing of files in the host file system from the local file system. Further, the Examiner has not cited any part of the art that teaches or suggests that the mapping data structure has a transfer type that defines a data format for transferring data between the host system and local system to support remote editing. .

Accordingly, Applicants submit that claim 1 is patentable over the cited combination because the cited Stedman, Imai, and Buckley, alone or in combination, do not teach or suggest all the requirements of claim 1.

Claims 9-14 and 22-24 are patentable over the cited art because they depend from claim 1, which is patentable over the cited art for the reasons discussed above. The following dependent claims provide additional grounds of patentability over the cited art.

Claim 9 depends from claim 1 and further requires that the mapping data structure comprises a local file extension data structure storing a local file extension; and a host file pattern data structure storing a pattern describing a host file to which the local file extension will be applied.

The Examiner cited col. 9, lines 1-15 of Buckley as teaching the claim requirement of a host file pattern data structure storing a pattern describing a host file to which the local file extension will be applied. (OA9, pgs. 7-8) Applicants traverse.

The cited Buckley mentions an encoder to encode additional data that will be sent to a server. Step 250 emits into the encoded data stream properties. The number of properties is represented as a DWORD. At step 252, the property tag for the next property line is emitted, where a property tag code has an identifier for the property name and a property tag code that identifies a property data type.

Nowhere does the cited Buckley teach or suggest the claim requirement of a host file pattern data structure storing a pattern describing a host file to which the local file extension will be applied. Instead, the cited col. 22 discusses encoding a property in a data stream.

Accordingly, claim 9 provides additional grounds of patentability over the cited art because the cited combination of references does not teach or suggest all the claim requirements.

On page 6, the Examiner grouped claims 4, 22, and 29 in his rejection. (OA9, pg. 6) Applicants note that each of these claims recite very different limitations. However, in applying the cited art in the paragraph grouping claims 4, 22, and 29, paragraph 9, the Examiner recited the requirements of claims 4, 10, and 17. (OA9, pg. 6) Accordingly, Applicants will assume that the Examiner intended to apply the cited Imai, col. 27, lines 23-35 with respect to pending claim 10, which includes the requirements to which the Examiner referenced Imai, not claim 22 as listed.

The Examiner cited col. 27, lines 23-35 of Imai as teaching the claim requirement that the mapping data structure further comprises a host codepage data structure storing an identification of a host codepage in which data in the host file is encoded and a local-codepage data structure storing an identification of a local codepage in which data in a local file is encoded. (OA9, pg. 6). Applicants traverse.

The cited col. 27 mentions transferring only those files selected according to the file type to prevent waste due to the transfer of files that cannot be utilized at the file requesting client. In a third example, the multiple files transfer request unit is for transferring only those files which match the transfer condition provided in the file requesting client. Nowhere does this cited col. 27 anywhere teach or suggest a mapping data structure further including a host codepage data structure storing an identification of a host codepage in which data in the host file is encoded and a local-codepage data structure storing an identification of a local codepage in which data in a local file is encoded. Nowhere is there any mention or suggestion of host and local codepages as claimed.

Accordingly, claim 10 provides additional grounds of patentability over the cited art because the cited combination of references does not teach or suggest all the claim requirements.

Claim 22 depends from claim 1 and further requires that a first transfer type indicates to transfer one file unmodified between the host file system and the local file system and wherein a second transfer type indicates to translate text in the file to transfer from the host file system to the local file system.

The Examiner cited col. 19, lines 1-16 of Buckley as teaching the additional requirements of claim 22. (OA9, pg. 8) Applicants traverse.

The cited Buckley mentions an encoder to encode additional data that will be sent to a server. Step 250 emits into the encoded data stream properties. The number of properties is

represented as a DWORD. At step 252, the property tag for the next property line is emitted, where a property tag code has an identifier for the property name and a property tag code that identifies a property data type.

Nowhere does the cited Buckley teach or suggest two transfer types, one to transfer a file unmodified between host and local file systems and a second transfer type that translates text in the file to transfer. There is no mention or teaching in the cited Buckley of two transfer types for transferring a file, one that translates the text and another that does not. Instead, the cited Buckley discusses encoding a property, including a property tag code having a property name identifier and a tag code identifying a property data type. There is no teaching or suggestion of a mapping data structure comprising a mapping of a file in the local file system to the host file system and a transfer type defining how to transfer data between the systems. Further, there is no suggestion of the specific claimed transfer type of claim 22 of transfer types that indicate to translate a file being transferred or transfer unmodified as claimed.

Accordingly, claims 22 provides additional grounds of patentability over the cited art because the cited combination of references does not teach or suggest all the claim requirements.

#### Conclusion

For all the above reasons, Applicant submits that the pending claims 1, 9-14 and 22-24 are patentable over the art of record. Should any additional fees be required, please charge Deposit Account No. 09-0460.

The attorney of record invites the Examiner to contact him at (310) 553-7977 if the Examiner believes such contact would advance the prosecution of the case.

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